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Hearing Date: May 27, 2009
Hearing Time: 10:00 AM (EDT)
Objection Deadline: May 22, 2009

*Attorneys for Irving H. Picard, Esq.,
Trustee for the SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (BRL)
SIPA Liquidation

**NOTICE OF TRUSTEE'S MOTION PURSUANT TO SECTION 78fff(a) OF THE
SECURITIES INVESTOR PROTECTION ACT AND SECTIONS 105(a) AND 363 OF
THE BANKRUPTCY CODE AUTHORIZING THE AMENDMENT OF AND
TERMINATION OF CERTAIN EMPLOYEE BENEFIT PLANS**

PLEASE TAKE NOTICE that a hearing on the attached motion (the "Motion") will be held before the Honorable Burton R. Lifland, United States Bankruptcy Judge, on May 27, 2009 at 10:00 a.m. (EST), or as soon thereafter as counsel may be heard, at the United States Courthouse, One Bowling Green, Courtroom 623, New York, New York 10004.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief sought in the Motion shall be in writing, state with particularity the basis for the objection, and be filed with the Bankruptcy Court in accordance with General Order #462 by users of the Bankruptcy Court's case filing system, and by all other parties, on a 3.5 inch disk, with a hard copy to Chambers, and served in accordance with General Order #462 and upon: (a) Baker & Hostetler LLP, attorneys for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan, Esq. and Marc E. Hirschfield, Esq.; and (b) the Securities Investor Protection Corporation, 805 Fifteenth Street, NW, Suite 800, Washington, DC 20005, Attn: Kevin H. Bell, Esq., so as to be received no later than 5:00 p.m. (EDT) on May 22, 2009. Any such objection shall state with specificity the reason or reasons why the relief sought in the Motion should not be granted.

Dated: New York, New York
May 15, 2009

Respectfully submitted,

/s/ Marc Hirschfield

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